

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. 46

CERTIFICATION OF COUNSEL

I, Kimberly A. Brown, proposed counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On November 19, 2022, the Debtors filed the *Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Claims of Critical Vendors, Foreign Vendors, 503(b)(9) Claimants and Lien Claimants, (II) Granting Administrative Expense Priority to All Undisputed Obligations on Account of Outstanding Orders, (III) Authorizing All Financial Institutions to Honor All Related Payment Requests and (IV) Granting Certain Related Relief* [D.I. 46] (the “Motion”).

2. The Debtors received informal comments (the “Informal Comments”) on the proposed form of order filed with the Motion from the United States Trustee (the “UST”).

3. To resolve the Informal Comments the Debtors received on the Motion, the Debtors have revised the proposed form of interim order (the “Revised Interim Order”), a copy of which is attached hereto as **Exhibit A**. A copy of the Revised Interim Order compared against

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

the proposed order attached to the Motion is attached hereto as **Exhibit B**. The UST has no objection to the entry of the Revised Interim Order. In accordance with the Court's electronic order processing procedures, a clean copy of the Revised Interim Order shall be uploaded to CM/ECF.

4. Accordingly, the Debtors respectfully request that the Court enter the Revised Interim Order at its earliest convenience.

Dated: November 23, 2022
Wilmington, Delaware

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